

STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

Molly L. Dennis,

Plaintiff,

v.

City of Rochester, and Kim Norton, in  
her individual as well as official  
capacity as the mayor of the City of  
Rochester,

Defendants.

Case No. 24-cv-00426-PJS-DLM

MOTION TO AMEND COMPLAINT

To: The Honorable Douglas L. Micko, Magistrate Judge of the United States District Court, and Jenny Gassman-Pines and Farah Famouri, counsel for the Defendants.

The undersigned counsel Molly L. Dennis moves the court as follows:

Pursuant to Rule 15 of the Rules of Federal Civil Procedure for an Order allowing the filing of an Amended Complaint, attached and incorporated by reference to this motion. The Plaintiff will request that any amendments relate back to the original filing of the Complaint and further that service of the amended complaint will be effective upon e-filing of the Amended Complaint without the necessity of a summons.

The attached proposed Amended Complaint fully incorporates the Amended Complaint filed in District Court for the State of Minnesota, Olmsted

County, which was subsequently removed to federal court. The proposed amendments to the complaint are in bold type in the attached proposed amendment.

Dated: June 30, 2025

Signed: /s/ PAUL T. OSTROW  
OSTROW LAW LLC

Signed: s/ John Hayden  
Quantum Lex PA